



**GEORGIA GOVERNMENT TRANSPARENCY &
CAMPAIGN FINANCE COMMISSION**

Administrative Dismissal

**TO: David H. Emadi
Executive Secretary**

**FROM: Joseph M. Cusack
Senior Staff Attorney**

DATE: April 27, 2021

**RE: RECOMMENDATION FOR ADMINISTRATIVE DISMISSAL
In the Matter of Paul L. Howard
Case Number: 20-0053-C**

On August 3, 2020, the Commission received a third-party complaint filed by Noah Pines ("Complainant") against Paul L. Howard ("Respondent"). Respondent was the District Attorney of Fulton County when this Complaint was filed and was defeated in a run-off election held on August 11, 2020. Complainant alleges that Respondent violated the Act by accepting an agency contribution in violation of O.C.G.A. § 21-5-30.2(b). The Complaint alleged that Respondent had solicited campaign contributions via e-mail and directed the contributions to be sent to Respondent's campaign headquarters which was listed as 136 Pryor Street. This location is the Fulton County District Attorney's Office, a public agency as defined by O.C.G.A. § 21-5-30.2. Complainant alleges that Respondent used the Fulton County District Attorney's Office as his campaign headquarters, and this is an agency contribution in the form of office space.

Commission staff investigated the allegations and determined that the fundraising e-mails were sent by a third-party vendor who mistakenly listed the headquarters for Respondent's campaign as the Fulton County District Attorney's Office. Respondent provided three other addresses where the campaign was headquartered and the P.O. box where campaign contributions were to be received. None of these addresses were located in any government buildings or had any affiliation to the Fulton County District Attorney's Office. From the information obtained about the campaign headquarters and information obtained from a separate investigation into Respondent by Commission Staff there is no appearance of contribution by a public agency or acceptance of a contribution by a public agency by the Respondent.

Since no violations of the Act occurred, there is no basis to proceed. Based upon the forgoing analysis, this complaint should be administratively dismissed pursuant to Ga. Comp. R. & Regs. 189-2-.03(5).



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I, David H. Emadi Executive Secretary of the Georgia Government Transparency and Campaign Finance Commission, agree with the above analysis to administratively dismiss this complaint. Thus, the above-referenced complaint shall stand dismissed.



David H. Emadi, Executive Secretary



Date